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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

UNITED STATES OF AMERICA ,

Plaintiff,

v.

SYLVIANE DELLA WHITMORE, aka  
Sylviane Cordova,

Defendant.

2:17-CR-110-APG-CWH

**Government's Unopposed Motion To  
Extend the Time to Reply to Whitmore's  
Objection (ECF No. 120) to the  
Government's Motion for Interlocutory  
Sale (ECF No. 113)**

**(First Request)**

The United States of America respectfully moves this Court for an Order extending the time for the government to reply to defendants' Objection to the Government's Motion for Interlocutory Sale (ECF No. 120). The government requests an extension of time to and including March 29, 2019. This is the first request.

The grounds for extending the time are as follows.

On February 26, 2019, the undersigned counsel called Robert Draskovich, counsel for defendant, who agreed to this extension of time.

The undersigned has a large and active case load. Undersigned has had many tightly scheduled deadlines with the court for complex issues that have taken large amounts of time and resources to complete. Undersigned has worked extremely hard and efficiently to meet all the deadlines, but he has not had time to address the Objection.

The Asset Forfeiture Unit (AFU) in the United States Attorney's Office for the District of Nevada (USAO) is understaffed. AFU lacks two paralegal specialists and one full

1 time forfeiture Assistant United States Attorney (AUSA) in Las Vegas and one AUSA in  
2 Reno, Nevada. The undersigned is currently the only forfeiture AUSA in the USAO.  
3 Between the lack of staff, the lack of forfeiture AUSAs, and the criminal forfeiture  
4 workload, the forfeiture work in the USAO has backed up significantly. The undersigned is  
5 doing the best he can under the circumstances.

6 This Motion is not submitted solely for the purpose of delay or for any other  
7 improper purpose.

8 This Court should grant an extension of time to, and including, March 29, 2019, for  
9 the United States to reply to defendants' objection (ECF No. 120).

10 DATED: February 26, 2019.

11 NICHOLAS A. TRUTANICH  
12 United States Attorney

13 /s/ Daniel D. Hollingsworth  
14 DANIEL D. HOLLINGSWORTH  
15 Assistant United States Attorney

16 IT IS SO ORDERED:

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18 \_\_\_\_\_  
19 United States Magistrate Judge

20 DATED: February 27, 2019  
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/s/ Heidi L. Skillin  
HEIDI L. SKILLIN  
Asset Forfeiture Paralegal